

Valli Kane & Vagnini
Attorneys at Law

600 Old Country Road
St. 519
Garden City, New York 11530

Tel: 516-203-7180
Fax: 516-706-0248
www.vkvlawyers.com

February 27, 2020

Hon. Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, New York 10007

Re: *Fischman v Mitsubishi Chemical Holdings America, Inc., et al*
Case #: 1:18-cv-08188-JMF

Dear Judge Furman:

We represent plaintiff Jennifer Fischman ("Plaintiff") in the above-referenced matter. We write to update the Court concerning our letter motion dated February 26, 2019, where we requested an extension of the deadlines set forth in Your Honor's Order dated January 21, 2020.

Our original letter motion indicated that we had sought consent of the defendants MCHC and MCC. We write to update the Court and to inform Your Honor that we have now obtained the consent of all parties.

Accordingly, Plaintiff's counsel respectfully requests a fourteen (14) day extension of the deadlines set forth in the Order so that it has the benefit of the information that MCHA's counsel has agreed to provide, and in order to avoid potentially unnecessary motion practice in connection with resolution of the Motion.

Application GRANTED. Plaintiff shall file an amended complaint or opposition to the motion to dismiss by **March 13, 2020**. If Plaintiff files an amended complaint, Defendants shall respond by filing an answer, new motion to dismiss, or letter on ECF stating that they rely on their previously filed motion **within three weeks after the amended complaint is filed**. If Plaintiff files an opposition, any reply shall be filed by **April 10, 2020**. The Clerk of Court is directed to terminate ECF Nos. 75 and 76. **SO ORDERED.**



Respectfully submitted,

VALLI KANE & VAGNINI LLP

/s/ Matthew L. Berman

SARA WYN KANE

ROBERT J. VALLI, JR.

MATTHEW L. BERMAN

Attorneys for Plaintiff

600 Old Country Road, Suite 519

Garden City, New York 11530

516-203-7180

February 27, 2020